UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MEMORANDUM

DATE: DEC 09 2010

SUBJECT: Enforcement Action Memorandum – Determination of Threat to Public Health and or the Environment at the Lindsay Light II Site/211 East Grand, Chicago, Cook County, Illinois (Site Spill ID # YT, OU 16)

FROM: Verneta Simon, On-Scene Coordinator
Emergency Response Branch II – Removal Section 4

THRU: Linda M. Nachowicz, Chief
Emergency Response Branch II

TO: Richard C. Karl, Director
Superfund Division

I. PURPOSE

The purpose of this Action Memorandum is to document the determination of an imminent and substantial threat to public health and the environment posed by the existence of thorium-impacted soils at Lindsay Light II ("Lindsay Light") Operable Unit ("OU") 16, 211 East Grand Site ("Site"). PRP activities at this Site will include, but are not limited to, excavation and proper disposal of contaminated soils while constructing a 14-story building.

The Site is approximately 0.17 acres and is located in an area called Streeterville that, beginning in 1993, has been the subject of several removal actions to remove radioactive thorium waste. There have not been any response actions initiated using the On-scene Coordinator $50,000/$250,000 delegation and warrant authority.

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILD 0000002212
RCRA ID: None
STATE ID: None
Category: Time-Critical

A. Site Description

1. Removal site evaluation

During September 2010, the environmental consultant, AECOM, hired by the property owner, Ronald McDonald House Charities of Chicagoland & Northwest Indiana (RMC), contacted USEPA to inform us of the results of recent radiological screening. Below is the relevant portion of AECOM's e-mail dated September 24, 2010:

On September 16, 2010, AECOM conducted radiological screening in a couple of test pits that showed elevated gamma readings indicative of radiologically-impacted material at the 211 E. Grand site. Initially down-hole radiological screening was complete at the site in three geotechnical borings late this summer. One of the borings (B10-1) located in northeast corner of the property in the former drive way area (refer to Figure A-1 AECOM Site Soil Boring Location Diagram) indicated a slightly elevated gamma reading. A reading of 15,379 counts per 30-secs was observed at a depth interval of 2-2.5 feet, which was slightly over the instrument equivalent to the USEPA cleanup cut-off value of 12,000 counts per 30-secs. Readings at the 6" intervals above and below this depth were slightly less than the cleanup value (11,684 and 11,109 counts per 30-secs, respectively). Neither of the other borings indicated any gamma readings near or above the USEPA cleanup threshold.

Since there was only one measurement slightly over the USEPA threshold, it was believed that there was a possibility that the meter was reading brick and/or granite paver material where the natural radioactivity may have been contributing to the observed gamma readings. As such, a plan to visually examine the materials contributing to the elevated gamma reading was coordinated with testing pitting to observe the foundations of adjacent structures on September 16, 2010. Initial excavation in the area of the boring indicated gamma reading that ranged from 14,000 to 16,000 counts per minute (cpm), which is below the Ludlum threshold value of 17,522 cpm that is equivalent to the USEPA cleanup value of 7.1 pCi/g total radium. As excavation proceeded, the gamma reading increased slightly and exceeded the USEPA cleanup threshold and ranged from 19,000 to 21,000 cpm at a depth of about 18-inches. Soil/fill materials removed from the test pit remained below the USEPA cleanup threshold. When it was apparent that material above the USEPA cleanup threshold was present, excavation activities were halted to avoid the excavation of impacted material and the test pit was backfilled. The soil/fill in the test pit at the base of the excavation, where elevated readings were observed, consisted of tan to black colored sand to gravel size material with cinders, ash and some brick/concrete debris.

Surface surveying of the remainder of the former drive indicated an area of elevated readings is present along the western edge of the drive near the former building foundation. Although readings at the surface were slightly elevated, it appeared the surface material may not be above the cleanup threshold and that the instrument is

measuring elevated/impacted material below the surface. The highest surface reading (50,000 cpm – refer to drawing) occurred about 41 feet south of the sidewalk and 17 feet west of the eastern property boundary. Hand excavation of a small area to a depth of about 1-foot at the highest surface reading indicated a maximum of 106,000 cpm versus the instrument threshold of 17,522 cpm. A sample of the material was retained for future potential analysis.

In summary, it appears that an area just below the current surface (maybe 6 X 40 feet – parallel to the former foundation) on the western side of the former drive exhibits slightly elevated gamma readings that are indicative of soil/fill impacted with Lindsay Light thorium material. Visual examination in the area of the elevated gamma measurements indicated that the readings were inconsistent with natural materials such as brick and/or granite pavers. Based on the limited amount of delineation conducted, it does not appear that the radiologically-impacted material is more than a couple of feet in thickness, but additional investigation would be necessary to quantify the extent and volume of material.

On October 20, 2010, AECOM contacted EPA to provide gamma spec analysis of the sample collected on September 16, 2010. Below is the summary from AECOM's e-mail:

Attached is a PDF copy of the gamma spec analysis of the sample collected at the site in September 16, 2001 during the test pitting. The sample was collected a foot below the surface at the location which exhibited the highest surface gamma readings. The Ludlum reading at the sample location was approximately 100,000 cpm. The gamma spec. results indicate a total radium (Ra226 and Ra228) concentration of about 44 pCi/g with the Ra228 isotope concentration at 39.5 pCi/g.

2. Physical location

This Site is located at 211 East Grand, Chicago, Cook County, Illinois (Figure A-2). The Site is approximately 0.17 acre. The geographical coordinates for the Site are Latitude 41° 53' 31.974" North and Longitude 87° 37' 19.264" West.

Immediately surrounding this property are properties USEPA previously radiologically evaluated, discovered thorium contaminated soils above the 7.1 pCi/g clean-up level and required remediation. Figure A-2, the City of Chicago Streeterville Thorium Map, identifies the properties that have been evaluated and/or remediated since about 1993. One property immediately east of the Site has not been evaluated because the proper owner refused to allow EPA access to conduct an evaluation.

An Environmental Justice (EJ) analysis was performed. The analysis is contained in Attachment 1. The area surrounding the Lindsay Light II Site/OU16 211 East Grand was screened using Region V's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern

according to EPA Region V. The Lindsay Light II Site is in a census tract with a score of 1 (Attachment 1). Upon closer analysis, within 1 mile of the Site, the demographics are as follows: the population is 23.5 % minority and 8.9 % of the population is living below the poverty level. Therefore, Region 5 does not consider the site to be high-priority potential EJ area of concern.

3. Site Characteristics

This property was formerly a multi-story building with various entry addresses including 207 East Grand, 209 East Grand, and 211 East Grand. For purposes of this Action Memorandum, the physical address will be 211 East Grand. Recently, the owner, RMC, demolished the multi-story building to prepare for construction of what RMC claims will be the largest Ronald McDonald House in the United States.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The radiological survey conducted by RMC's environmental consultant demonstrated the presence of elevated gamma in the northeast corner of the property. The specific results were 106,000 counts per minute gamma and the cut-off on their instrument was 17,522 cpm. The 17,522 cpm equates to the clean-up criterion for Streeterville of 7.1 picoCuries per gram (pCi/g). The Streeterville clean-up criterion was established in the 1990's. In addition, AECOM analyzed a soil sample and the result was 44 pCi/g. There have been a number of Action Memoranda for properties in the area. All administrative records are fully incorporated by reference into this document.

5. NPL status

This site is not on the National Priorities List (NPL).

6. Maps, pictures and other graphic representations

Figure A-1 AECOM Site Soil Boring Location Diagram, Figure A-2 City of Chicago Streeterville Thorium Map, and Attachment 1 - Environmental Justice (EJ) analysis are included as attachments.

B. <u>Other Actions to Date</u>

1. Previous actions

As mentioned earlier, EPA has been assessing the radiological contamination in the Streeterville area of Chicago since about 1993. The prior owner did not allow us to do a radiological survey of 211 E. Grand.

2. Current actions

In preparation of the upcoming construction of the Ronald McDonald House, RMC performed geotechnical borings, test pits, and other activities.

C. <u>State and Local Authorities' role</u>

1. **State and local actions to date**
   The City of Chicago established Right-of-Way permit procedures to ensure that before and during work that exposes or intrudes into subsurface soils, Streeterville rights-of-ways are radiologically screened. The Right-of-Way permit procedures were established in 1999. A description of the procedures and a map of the affected Streeterville area are available on the City of Chicago's website. The State of Illinois's role is described below.

2. **Potential for continued State/Local response**

   Since 1993, EPA has taken the lead on CERCLA response activities to Lindsay Light-related thorium contamination in Streeterville. In 1993, the Illinois Department of Nuclear Safety (now known as the Illinois Emergency Management Agency, Division of Nuclear Safety (IEMA)) participated in a joint building survey with EPA and ATSDR, but because Lindsay Light was not a licensed radioactive materials facility, IEMA involvement has been very limited since that time.

III. THREAT TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORYAND REGULATORY AUTHORITIES

Conditions at the Site may pose an imminent and substantial endangerment to public health or welfare or the environment, based upon factors set forth in the National Contingency Plan (NCP), 40 Code of Federal Regulations (CFR) Section 300.415 (b)(2). These conditions include:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

Given our extensive experience in Streeterville and the proximity of this site to other Lindsay Light impacted properties and the latest sample and gamma results, it has been demonstrated that thorium-contaminated soils related to the Lindsay Light Company are present at this site. RMC intends to excavate portions of the site and construct a building. During these excavation and construction activities the owner may release thorium-contaminated soils.

High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

Given the September 16, 2010, surface gamma measurement of 106,000 cpm and the soil sample measurement of 44 pCi/g, if proper measures to identify and control radiological contamination are not implemented, thorium contaminated wastes may be released during construction work.

Other situations or factors which may pose threats to public health or welfare or the environment;

Beginning in approximately 1904, the Lindsay Light Company (Lindsay) manufactured gas lights and gas mantles for residential and commercial use, at several locations in the Streeterville neighborhood of Chicago. The historic record regarding Lindsay's volume of thorium production in Streeterville is uncertain. According to a U.S. Tariff Commission document on the Incandescent Gas-Mantle Industry published in 1920, in 1914 Lindsay expanded its thorium manufacturing capacity in Chicago to meet the increased domestic and foreign demand caused by the outbreak of war in Europe. The production of thorium for the gas light mantles resulted in a sandy waste known as mill tailings that was often used as fill material. The November 1935, Lindsay Board of Directors' Meeting minutes discussed plans to move Lindsay's Streeterville operations to the City of West Chicago by September 1936. The West Chicago facility became known as the Rare Earths Facility or REF. In West Chicago, Lindsay and its successors continued to produce thorium as well as other radioactive materials for commercial and defense-related purposes. As a result of Lindsay's Rare Earths Facility thorium manufacturing and disposal activities, four West Chicago areas were listed on the National Priorities List of Superfund Sites.

In the West Chicago area, EPA, with the assistance of IEMA, has overseen the clean-up of over 670 properties in residential areas, a 100-acre public park, a sewage treatment plant, and the clean-up of over six miles of creek and river in DuPage County. The widespread use and dispersal of the thorium material as fill in West Chicago likely reflects a similar widespread dispersal of the Lindsay Light thorium residuals in Chicago. Unlike the relatively open areas in the City of West Chicago where the extensive nature of the thorium contamination was relatively easy to identify, most of the Lindsay Light thorium was shielded from detection by asphalt, sidewalks, streets, and buildings. Consequently, appropriate

response actions are necessary to assure construction activities will not results in the uncontrolled exposure to or release of thorium contamination or improper disposal of the thorium-contaminated soils at or from the Site.

The availability of other appropriate federal or state response mechanisms to respond to the release;

As described in Section II and the Administrative Record, to date EPA has taken the lead in dealing with Lindsay Light-related thorium contamination in Streeterville.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the contaminants, radioactive materials that cause external exposure, inhalation, ingestion, and direct contact hazards, as described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed Action Description:

PRP activities at this Site will include, but are not limited to, excavation and proper disposal of contaminated soils while constructing a 14-story building. This building is essentially slab on grade but will require an elevator shaft and subsurface infrastructure.

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

a) Develop a Work Plan for the radiological assessment of the site.

b) Develop and implement a site health and safety plan.

c) Develop and implement an air monitoring plan.

d) Develop and implement site security measures.

e) Conduct land surveying to the extent necessary to establish a grid system to locate all property boundaries, special features (pipes, storage tanks, etc.), and sample locations.

f) Conduct off-site radiological surveying and sampling as necessary should contamination be discovered within the sidewalk rights-of-ways surrounding the Site and, at a minimum implement 40 C.F.R. Part 192 if deemed necessary.

g) Based upon soil results, remove, transport and dispose of all characterized or identified hazardous substances, pollutants, wastes or contaminants at a RCRA/CERCLA approved disposal facility in accordance with the U.S. EPA off-site rule.

h) The soil clean-up criterion is 7.1 picoCuries per gram (pCi/g) total radium (Ra-226 + Ra-228) including background, unless analyses indicate the existence of additional contaminants, hazardous substances, pollutants or waste.

i) If any portion of the Site is not radiologically surveyed in 18-inch lifts or if any known contamination will remain after completion of the Work then Respondent shall identify and depict all locations at the Site that were not radiologically surveyed in 18-inch lifts or where any known contamination will remain after completion of the Work and shall implement U.S. EPA-approved deed restrictions or other U.S. EPA-approved institutional controls pertaining to the Site.

2. Contribution to Remedial Performance:

The proposed action will not impede future responses based upon available information.

3. Engineering Evaluation/Cost Analysis (EE/CA):

Not Applicable

4. Applicable or Relevant and Appropriate Requirements (ARARs):

All applicable or relevant and appropriate requirements (ARARs) will be complied with to the extent practicable. The primary federal Applicable or Relevant and Appropriate Regulation for radioactive soil cleanup criteria is Title 40, Part 192 of the Code of Federal Regulations, "Health and Environmental Protection Standards for Uranium and Thorium Mill Tailings." Ancillary ARARs include the Nuclear Regulatory Commission's (NRC) Title 10, Part 20, of the Code of Federal Regulations, "Standards for Protection Against Radiation," NRC Regulatory Guide 1.86, "Termination of Operating License for Nuclear Reactors," and the Department of Transportation's Title

49 for shipping hazardous materials. Relevant EPA guidance includes OSWER Directive No. 9200.4-25, issued February 12, 1998, regarding the "Use of Soil Cleanup Criteria in 40 CFR Part 192, as Remediation Goals for CERCLA Site."

Many of the regulations carried out by the NRC have been delegated to the Illinois Emergency Management Agency, Division of Nuclear Safety. The State has previously identified the regulations at 32 Ill. Administrative Code 332, Licensing Requirements for Source Material Milling Facilities which contain the licensing requirements for source material milling facilities in Illinois as relevant and appropriate to the cleanup of thorium in Streeterville. The cleanup standard for soils and sediment at the Site derived from the foregoing federal and state regulations is 7.1 pCi/g combined radium.

EPA will also implement the principle of ALARA (As Low As Reasonably Achievable) which refers to the cleanup of all materials above the cleanup standard, to the extent practicable. ALARA is described in DOE and NRC orders and regulations and in EPA regulations at 40 CFR § 192.22. EPA made the decision to achieve ALARA in an attempt to maximize protection of human health.

5. Project Schedule:

Not applicable

B. <u>Estimated Costs</u>

Not available, since this is an Enforcement Action Memorandum.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the facility which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV above, actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment, increasing the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment. Delayed or

non-action may result in increased likelihood of external exposure, inhalation, ingestion or direct contact to human populations accessing and working on the site. Also, since there is no threshold for radiological risk, additional exposure to radiological materials will increase the cancer risk.

VII. OUTSTANDING POLICY ISSUES

It might be necessary to use funds from the Lindsay Light Special Account because preliminary discussions with the charity involve leaving the contamination on-site and building on top of it. This suggestion is not preferred because for all other Lindsay sites developers or owners have cleaned up to the property boundary and only left contamination in the right-of-way to be dealt with as necessary.

VIII. ENFORCEMENT

For Administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum .

IX. RECOMMENDATION

This decision document represents the selected removal action for the Lindsay Light II Site/211 East Grand, Chicago, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for this Site (Attachment 2). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE: _____ 10/9/10
Director, Superfund Division Date

DISAPPROVE: _____
Director, Superfund Division Date

Enforcement Addendum

Figures:

A-1 AECOM Site Soil Boring Location Diagram
A-2 City of Chicago Streeterville Thorium Map

Attachments

1. Environmental Justice Analysis
2. Index to the Administrative Record

cc: D. Chung, EPA, 5203-G
M. Chezik, U.S. Department of Interior, w/o Enf. Addendum
D. Scott, Illinois Environmental Protection Agency, w/o Enf. Addendum
S. Davis, Illinois Department of Natural Resources, w/o Enf. Addendum
B. Everetts, Illinois Environmental Protection Agency, w/o Enf. Addendum
G. McCandless, Illinois Emergency Management Agency, w/o Enf. Addendum
K. Worthington, Chicago Department of Environment, w/o Enf. Addendum
B. Haller, Chicago Department of Planning and Development, w/o Enf. Addendum

BCC PAGE

(REDACTED 1 PAGE)

ENFORCEMENT CONFIDENTIAL ADDENDUM

LINDSAY LIGHT II SITE
OU 16 - 211 E. GRAND AVENUE
CHICAGO, COOK COUNTY, ILLINOIS

OCTOBER 2010

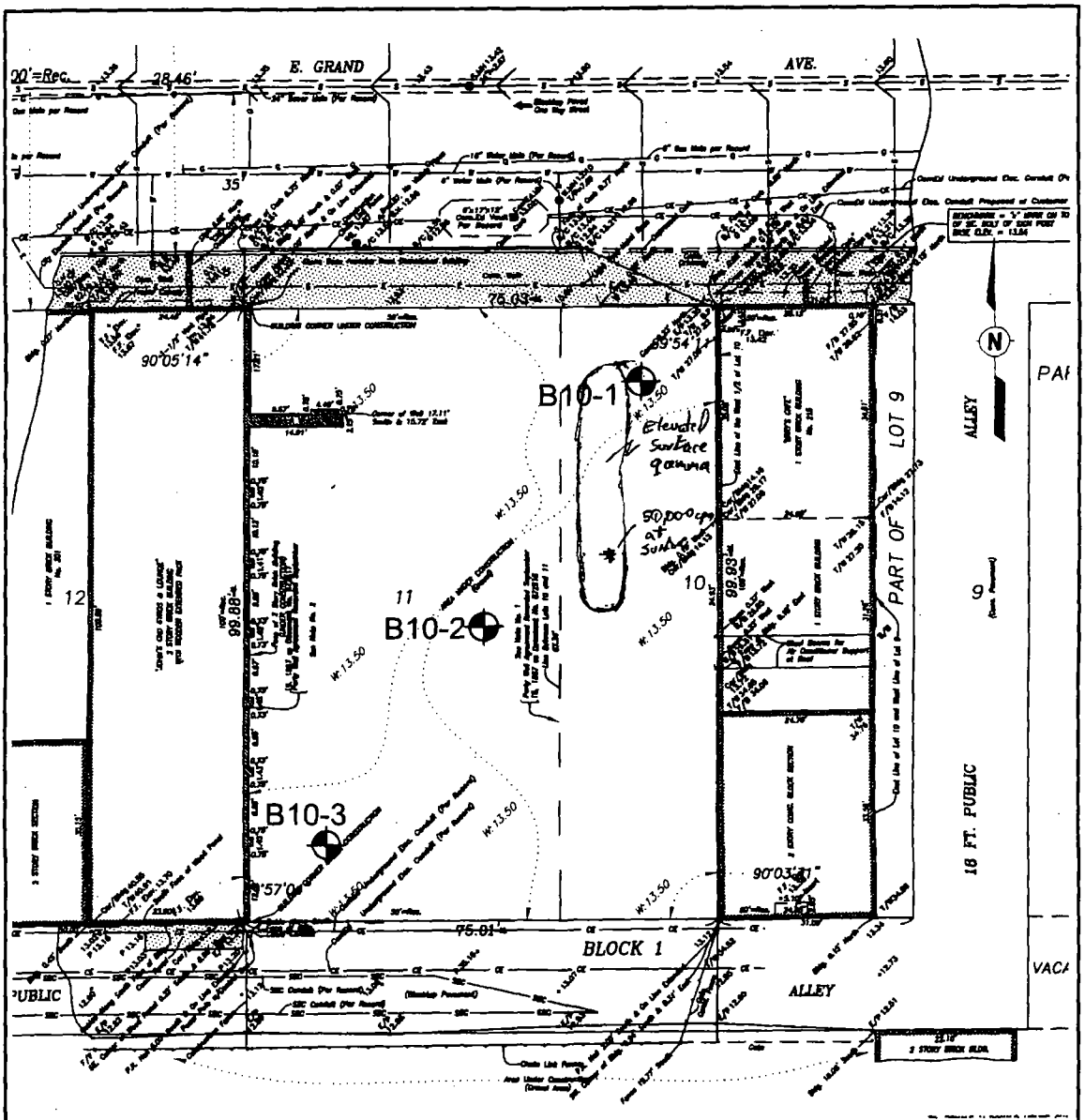
(REDACTED 2 PAGES)

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

INSERT Figures:

A-1 AECOM Site Soil Boring Location Diagram

A-2 City of Chicago Streeterville Thorium Map



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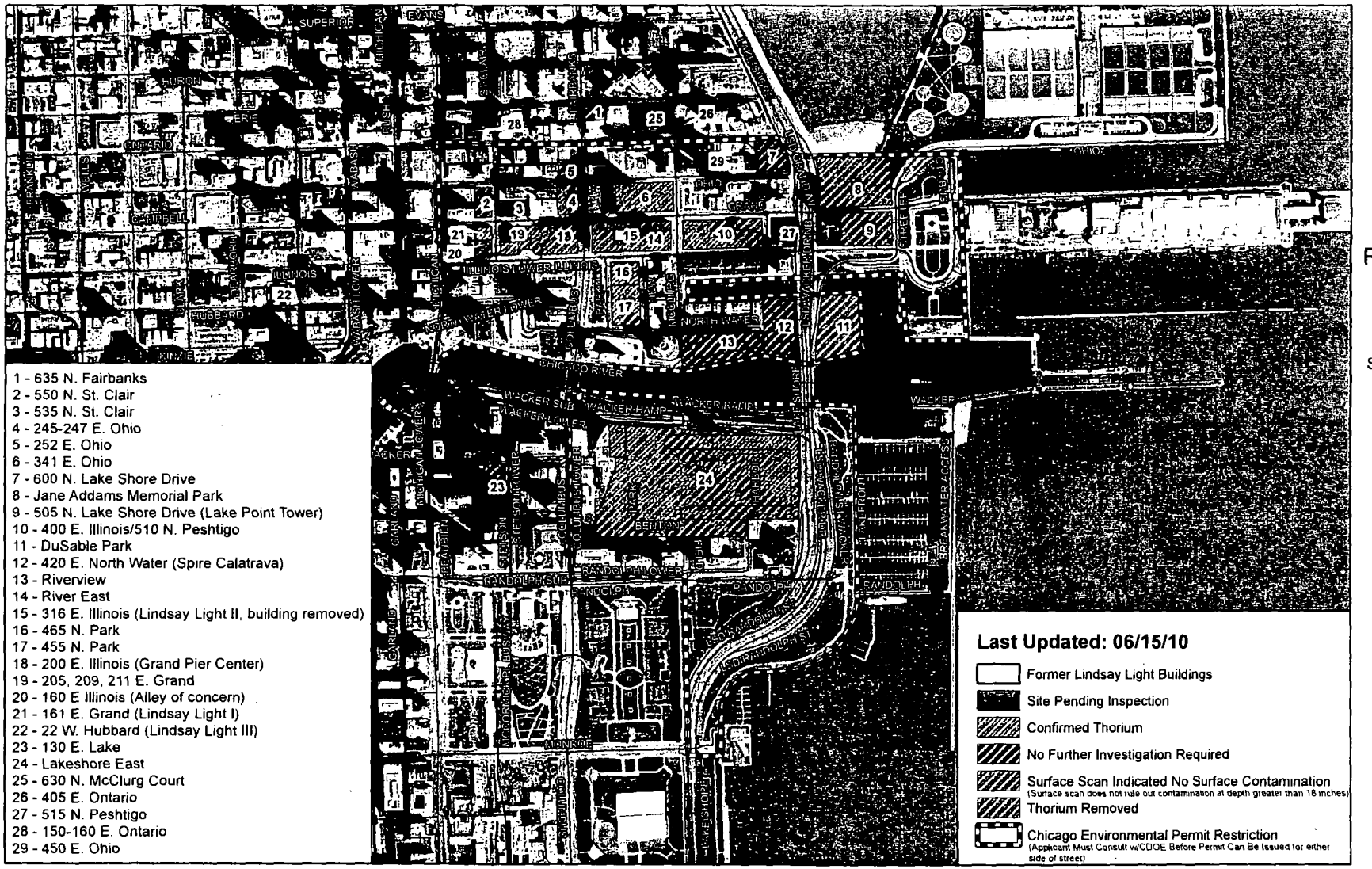
AECOM

847.279.2500
www.aecom.com

SOIL BORING LOCATION DIAGRAM
PROPOSED RONALD MCDONALD HOUSE
RONALD MCDONALD HOUSE CHARITIES
211 E. GRAND AVENUE
CHICAGO, ILLINOIS

Drawn:	PCC	06/25/2010
Checked:	PCC	06/25/2010
Approved:	TAK	06/25/2010
PROJECT NUMBER	60157402	
FIGURE NUMBER	1	

Streeterville Thorium Investigation



S:\BRN_FLDS\Streeterville Thorium\Aerial Map

Area Boundaries are approximate

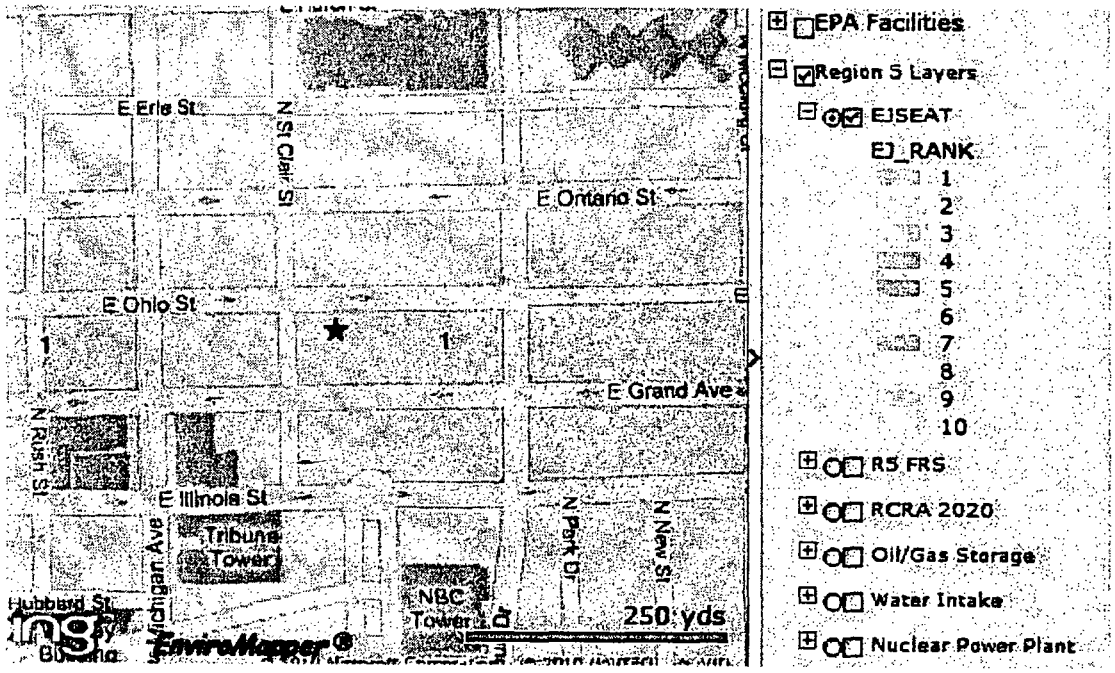
City of Chicago
Richard M. Daley
Mayor

Department of
Environment
Suzanne Malec-McKenna
Commissioner

N
W
E
S

Superfund EJ Analysis for the Lindsay Light II OU16 Site
Attachment 1

Lindsay Light II Site Map Showing EJ SEAT Values For Surrounding Area



ATTACHMENT 2

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
LINDSAY LIGHT II SITE
OPERABLE UNIT 16/211 EAST GRAND
CHICAGO, COOK COUNTY, ILLINOIS

ORIGINAL
NOVEMBER 2010

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	09/12/00	Arkell, R., U.S. EPA	Addressees	E-mail Message re: Transmittal of Ownership Information for 211 East Grand Avenue **(SDMS ID: 226725)**	2
2	09/18/00	Simon, V., U.S. EPA	Lakeside Bank	Letter re: Indoor Radiation Survey at 211 East Grand Avenue/Request for Access and Information **(SDMS ID: 226730)**	4
3	09/18/00	Arkell, R., U.S. EPA	File	Affidavit of Personal Service/Request for Access and Information **(SDMS ID: 226731)**	1
4	09/29/00	Arkell, R., U.S. EPA	Addressees	E-mail Message re: Transmittal of Ownership Information for 166, 201, 205, 207-209, 215, 227 East Grand Grand Avenue and 530 North Lake Shore Drive **(SDMS ID: 226197)**	2
5	11/28/00	Collins, G., Agent	Simon, V., U.S. EPA	Letter re: Transmittal of Consent for Access to Property at 211 East Grand Avenue **(SDMS ID: 226729)**	2
6	11/29/00		Addressees	E-mail Message re: Agenda for Dec. 4, 2000 Meeting at U.S. EPA Offices Discussing Status of Properties Contiguous to Known Contamination Site - Grand Pier Development **(SDMS ID: 225989)**	1

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
7	02/09/01	Simon, V., U.S. EPA	Kornarcos, A., Network Century	Letter re: Notice of Indoor Radiation Survey to be Conducted on Feb. 17, 2001 at 211 East Grand Avenue w/Attached Facsimile Cover Sheets **(SDMS ID: 226728)**	10
8	04/10/01	Abolt, W., City of Chicago	Collins, G., 211 East Grand Avenue	Letter re: Notification of Inspection at 211 East Grand Avenue **(SDMS ID: 226727)**	1
9	07/18/01	Martwick, C., U.S. EPA	Bedell, G., Collins and Bargione	Letter re: Consent for Access to Property at 211 East Grand Avenue **(SDMS ID: 226726)**	1
10	10/03/06	Gabriel Environmental Services	Republic Bank	Phase I Environmental Site Assessment of the 211 East Grand Property **(SDMS ID: 321480)**	175
11	11/16/09	Simon, V., U.S. EPA	Skiba, L., DACCORD Group, LLC	Letter re: Future Ronald McDonald House 207/209/211 East Grand Avenue **(SDMS ID: 345130)**	2
12	04/12/10	Simon, V., U.S. EPA	File	Meeting Sign-in Sheet re: Lindsay Light/Future Ronald McDonald House **(SDMS ID: 359556)**	1
13	04/28/10	Gutierrez, D., DACCORD Group, LLC	Simon, V., U.S. EPA	Letter re: AECOM Retained to Provide Geotechnical Engineering Services for Project at 211 East Grand Avenue **(SDMS ID: 362875)**	1
14	04/29/10	Simon, V., U.S. EPA	Gutierrez, D., DACCORD Group, LLC & D. Porter, Ronald McDonald House Charities	Letter re: Walk-over Radiation Detection Survey at Future Ronald McDonald House **(SDMS ID: 362869)**	3
15	09/24/10	Kornder, S., AECOM	Simon, V., U.S. EPA	E-mail Message re: Results of Radiological Screening Conducted on Sept. 16, 2010 w/Attached Soil Boring Location Diagram **(SDMS ID: 374464)**	3

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
16	10/20/10	Kornder, S. AECOM	Simon, V., U.S. EPA	E-mail Message re: Transmittal of Attached Gamma Spec Results Collected on September 16, 2010 at 211 East Grand Avenue **(SDMS ID: 379484)**	7
17	00/00/00	Simon, V., U.S. EPA	Karl, R., U.S. EPA	Enforcement Action Memorandum: Determination Of Threat to Public Health and or the Environment at the Lindsay Light II Site/ 211 East Grand/OU 16 **(PENDING)**	